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DISTRICT OF NEVADA	
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UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

Reverend Doctor Keith Alan Lasko, Minister)
 of the Worldwide Ministries of Jesus Christ,)
 Congregation of Religious Medical Ministries)

CIVIL ACTION

PLAINTIFF

PRO SE

CASE NO.: 2:13-cv-01893-JAD-NJK

v.

JURY TRIAL DEMANDED

American Board of Surgery, Inc.,)

American Board of Internal Medicine, Inc.,)

American Board of Medical Specialties, Inc.,)

Gabriel L Bevilacqua, Jo Buyske,)

Joseph B Cofer, Frank R Lewis, Jr.,)

David M Mahvi, Mark A Malangoni,)

Mitchell S Goldberg individually and in his)

official capacity, Saul Ewing LLP, et al)

DEFENDANTS)

PLAINTIFF MOTION FOR DEFAULT JUDGEMENT REGARDING PLAINTIFFALLEGATIONS OF CIVIL RIGHTS VIOLATIONS COMMITTED BY DEFENDANTSAGAINST PLAINTIFF AND NEVER ANSWERED IN A TIMELY FASHION

Each of the defendants participated in violating the civil rights, particularly the First Amendment Rights of Reverend Doctor Keith A Lasko and the First Amendment Rights of the closely held

Nevada not for profit religious Corporation: Worldwide Ministries of Jesus Christ.

2

Each Defendant was charged with civil rights violations including violating the First Amendment Rights of Reverend Lasko and the Worldwide Ministries of Jesus Christ, violating the Religious Freedom Restoration Act, Title 18 USC Sections 241, 242, 247, 249, and Title 42 USC Sections 1983, 1985, 1986, 1988, and violation of Human Rights Treaties of which United States is Signatory, including: United Nations Declaration of Human Rights and the International Covenant on Civil and Political Rights, and United States Treaties that include the Right to Organize and the Right to Freedom of Association: NAFTA and CAFTA.

3

There has been no timely response to the above allegations, which must therefore be taken as admitted to by the Defendants.

4

The American Board of Surgery Inc., Bevilacqua, the officers of American Board of Surgery Inc., and Saul Ewing LLP have been charged with violation of Reverend Lasko Due Process Rights with denial of the Due Process Right of Appeal of Goldberg's Orders, the Due Process violation of demanding a default judgement from Goldberg *before* Reverend Lasko was served at his legal address, writing extremely overbroad and over reaching orders that were to be signed by Judge Goldberg and were signed by Goldberg, blocking of Reverend Lasko Right to Appeal which was also rubber stamped by Goldberg, acting as judge, jury, and prosecutor during the hearing by Goldberg including the violation of Reverend Doctor Lasko's Fourth and Fifth amendment rights, and the threatening of Reverend Lasko with a federal debtor prison that has been outlawed since 1830, and the violation of the Eighth Amendment prohibition against cruel and unusual

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punishment, and the violation of Reverend Lasko First Amendment Freedom of Religious Expression, Freedom of Speech, Freedom of Religion, Freedom of Association, and violation of the Religious Freedom Restoration Act, and Violation of Human Rights Treaties, the violation of the Due Process Rights of Reverend Doctor Lasko, the violation of Equal Rights Under The Law, and treatment of Reverend Doctor Lasko as though he was not allowed to have the Constitutional Rights of a United States Citizen, and the depriving of Reverend Doctor Lasko Constitutional Rights and Human Rights.

5

The American Board of Surgery Inc., Bevilacqua, the officers of American Board of Surgery Inc, and Saul Ewing LLP have been charged with violation of the First Amendment Rights of the Worldwide Ministries of Jesus Christ, which was founded as a not for profit religious Nevada Corporation for the promotion of Christian Humanitarianism in the medical profession and promotion of the Ten Commandments in the medical profession and the promotion of the Words of Our Lord ans Savior Jesus Christ to be kind to one another as said in His Sermon on the Mount and known as the Golden Rule. This religious activity was stopped and thwarted and destroyed by all of the Defendants, particularly The American Board of Surgery Inc., Bevilacqua, the officers of American Board of Surgery Inc, and Saul Ewing LLP, violating the First Amendment Rights of a closely held not for profit Nevada religious corporation, and violating the Due Process Rights of that corporation. The Hobby Lobby Decision by the United States Supreme Court emphasizes the First Amendment Rights and Due Process Rights of this kind of corporation. Defendants have violated the First Amendment Rights and Due Process Rights of the corporation, Worldwide Ministries of Jesus Christ: violated Freedom of Religious Expression, violated the Freedom of Speech, violated the Freedom of the Press, Violated the Freedom of Religion, violated the

Freedom of Association, violated the Religious Freedom Restoration Act, violated all of these Rights of the Worldwide Ministries of Jesus Christ, violated the Due Process Rights of that corporation, and have damaged and destroyed that not for profit religious corporation, maliciously, and in utter disregard for the rights of a corporation and to further their restraint of trade and desire to perpetuate a monopoly and to punish by whatever means possible Reverend Doctor Lasko and his Ministry and his Church, and his religious mission to bring religious humanitarian values to the medical profession.

6

The libels and slanders of the American Board of Medical Specialties Inc against Reverend Lasko, made to physicians and on the Internet goes back to 2001, and their actions also violated the First Amendment Rights and Human Rights of Reverend Doctor Lasko.

7

The American Board of Internal Medicine Inc began a campaign of libel against Reverend Doctor Lasko in 2005, and continued this every year with extreme defamatory postings on the Worldwide Web to the defamation, and the destruction of the organizations and religious medical corporations founded by Reverend Doctor Lasko as components of the Worldwide Ministries of Jesus Christ and its Ministry and Mission of promotion of Christian Humanitarian Values, the Ten Commandments, the Words of Jesus Christ and the Golden Rule as given in Jesus Christ's Sermon on the Mount. These have been severe violations of Reverend Doctor Lasko First Amendment Rights, injuring and destroying his mission to bring Christian Humanitarian Values and the Ten Commandments to every medical specialty, and are violations of Reverend Doctor Lasko Freedom of Religious Expression, Freedom of Speech, Freedom of Religion, Freedom of Association, and violation of the Religious Freedom Restoration Act, and constituted a Conspiracy to violate Civil

Rights, to hire people who were given the job of destroying Reverend Doctor Lasko religious medical organizations, and with American Board of Surgery Inc a conspiracy and a conspiracy under color of law to violate Reverend Doctor Lasko Civil Rights and to violate the Rights of a Church and Ministry to Express and Promote and maintain its Religion, and an attack upon a minority religion populated by minority races in the United States and populated by ethnic minorities, all violations of Title 18 USC Sections 241, 242, 247, 249.

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Every defendant has violated Title 42 USC Sections 1983, which states that **every person** subjecting a United States Citizen to the deprivation of any rights shall be liable to the party that is injured. This is including Goldberg in his individual and in his official capacity.

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Conspiracy of two or more persons to deny a US Citizen of his Rights, is a Title 42 USC Section 1985 violation of Reverend Doctor Lasko Rights, and the violation has been made by every one of the Defendants.

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Every Defendant had the opportunity to prevent the violation of Reverend Lasko civil rights and failed to do so, in violation of Title 42 USC Section 1986.

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Every religious medical organization and every religious medical corporation founded by Reverend Doctor Lasko was comprised of hundreds of physicians and dentists most of whom were not white. The 6,000 physicians and dentists who were members, fellows, masters, registrars of the religious medical organizations and religious corporations founded by Reverend Doctor Lasko have been mainly of black, brown, yellow, non white racial physicians and dentists. The American

Board of Surgery Inc has destroyed all of these minority organizations and corporations, American Board of Surgery Inc has all white officers, all white board of governors, all white board members, and the American Board of Surgery Inc photographs showing their all white identity has been previously submitted to this court by Reverend Doctor Lasko. The American Board of Internal Medicine, Inc has continually defamed and libeled each of Reverend Doctor Lasko minority religious and minority racial organizations, destroying their credibility, destroying their ability to continue to attract members, and resulting, along with American Board of Surgery Inc, in the death of the minority religious and minority racial medical organizations and corporations founded by Reverend Doctor Lasko, and the character assassination not only of Reverend Doctor Lasko, but also of the organizations and corporations populated by racial minorities and religious minorities, and character assassination of minority physicians and dentists. The American Board of Medical Specialties Inc serves as the canopy for the American Board of Surgery Inc and American Board of Internal Medicine Inc in their racist activities and restraint of trade activities, and in their violation of religious pursuits and the defaming of minorities racially and religiously, Title 18 USC Section 247 the prevention of religious pursuits and prevention of Church activities and the destruction of the First Church of the Epiphany and the destruction of the Worldwide Ministries of Jesus Christ and the destruction of the Congregation of Religious Medical Ministries all violations of Title 18 USC Section 247, and the violation of Title 18 USC Section 249, the racist attack upon racial minorities and the destruction of religious minority and racial minority organizations and corporations.

“The jurisdiction in civil and criminal matters conferred on the district courts by the provisions of titles 13, 24, and 70 of the Revised Statutes for the protection of all persons in the United States in

their civil rights, and for their vindication, shall be exercised and enforced in conformity with the laws of the United States”, Title 42 USC Section 1988. Goldberg refused to follow the law and violated the judicial oath and acted outside of the role of a judge, which is to follow the law. Instead, Goldberg acted not as a judge, but rather as a co-conspirator with the other Defendants, and in violation of the Oath of a Judge violated the Law, ignored the United States Constitution, ignored the United States Supreme Court Decisions regarding permanent prior restraints being unconstitutional except in only the most extreme situations, ignored the First Amendment Rights of Reverend Doctor Lasko, ignored Reverend Doctor Lasko Due Process Rights and ignored Equal Rights Under the Law giving a default decision against Reverend Doctor Lasko before Reverend Doctor Lasko was notified at his legal address, giving extremely overbroad and extremely over reaching orders, destroying fifty religious medical organizations and religious not for profit corporations that had names completely different from the name that American Board of Surgery Inc said was infringed upon, then effectively denying the pauper Reverend Doctor Lasko from making any appeal by demanding \$10,000 from a homeless pauper in order for him to appeal the unconstitutional orders by Goldberg. Goldberg violated Reverend Doctor Lasko Freedom of Religious Expression and violated Freedom of Religion and told Reverend Doctor Lasko that there was no religion here, and that the Ten Commandments and the Sermon on the Mount by Jesus Christ and the First Church of the Epiphany and the Congregation of Religious Medical Ministries and the Worldwide Ministries of Jesus Christ and the Mission to bring religious humanitarian values to medicine “**have nothing to do with religion**” and “there is no first amendment here”, and violated Reverend Doctor Lasko Freedom of Religion, Freedom of Religious Expression, Freedom of Speech, Freedom of Association, Freedom of the Press, compelled Reverend Doctor Lasko to give evidence against himself despite Reverend Doctor Lasko invoking his Right not to

be witness against himself, then Goldberg violated the Fifth and Fourth Amendments by using the compelled testimony forced from Reverend Doctor Lasko against Reverend Doctor Lasko, and Goldberg asked the adversary, Bevilacqua and Saul Ewing LLP and American Board of Surgery Inc to be judge and jury and executioner against Reverend Doctor Lasko and for these adversaries of Reverend Doctor Lasko to be the ones to pronounce sentence against Reverend Doctor Lasko in a mockery of Equal Rights Under The Law and a mockery of Due Process of Law, and Goldberg violated the Constitutional provision of no cruel and unusual punishment by threatening seventy year old and ailing Reverend Doctor Lasko with a federal debtors prison specially for Reverend Doctor Lasko since Federal Debtors Prisons have been outlawed since 1830 as cruel and unusual punishment. Goldberg violated the First Amendment and the US Supreme Court Decisions that are binding upon every US court, by issuing a raft of permanent prior restraints against Reverend Doctor Lasko's First Amendment Rights with no reason cited for doing so, and according to the US Supreme Court this is the most serious violation of Freedom of Speech and Freedom of the Press, and the US Supreme Court has stated that only the most extreme circumstances can justify such prior restraints, giving examples such as giving atomic secrets to the enemy or giving military secrets to the enemy in wartime or yelling fire in a crowded theater and endangering masses of human lives in a stampede. Goldberg acted outside of the role of a judge in breaking the Law and violating the Constitution and the Bill of Rights. His actions against Reverend Doctor Lasko were done at the request of the American Board of Surgery Inc and its officers and Bevilacqua and Saul Ewing LLP, acting to violate the civil rights and human rights and Religious Freedom Restoration Act Rights and Due Process Rights and Fourth Amendment, Fifth Amendment, and Eighth Amendment Rights of Reverend Doctor Lasko and the Worldwide Ministries of Jesus Christ, and denying Reverend Doctor Lasko any semblance of having Equal

Rights Under The Law.

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Without ever denying a single one of the above allegations, Goldberg has relied upon “absolute immunity” to justify all of his acts in violation of the Law, of the Constitution and Bill of Rights, and in violation of the Religious Freedom Restoration Act, Human Rights Treaties, and Title 42 USC Sections 1983, 1985, 1986, 1988. The acts of violating the Law, the Constitution, the Bill of Rights, the Doctrine of Stare Decisis, and the ignoring of and violation of the Judicial Oath, are not the acts of a judge, are not any part of the legitimate function of a judge, and are not acts that should allow a judge who breaks the Law and his Sacred Oath as a Judge, to have absolute immunity, or any immunity for the commission of acts that are an attack against the Rule of Law and an attack upon the Constitution and the Constitutional Republic.

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The Civil Rights of Reverend Doctor Lasko have been violated by each one of the Defendants. No timely response to this allegation has been made. The First Amendment Rights and Due Process Rights of the Worldwide Ministries of Jesus Christ which was founded as a closely held religious not for profit corporation have been violated by each one of the Defendants. No timely response to this allegation has been made.

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In accordance to settled law, when allegations are not answered, the allegations are taken as admitted to be true.

PLEA: Plaintiff Reverend Doctor Lasko and Worldwide Ministries of Jesus Christ motion for a default judgement in their favor from each defendant for civil rights violations including violation

of the Religious Freedom Restoration Act and racist attacks destroying minority organizations and corporations. Plaintiff asks of Defendant Goldberg only attorney fees which since Plaintiff is Pro Se are minimal and not over \$50,000. From the other Defendants, Plaintiff asks the court for a judgement for civil rights violations in total of one million dollars in damages to be paid by the Defendants except Goldberg, and a punitive judgement for civil rights violations in total of one million dollars against the defendants other than Goldberg. Plaintiff further requests a statement by the Defendants that they will cease any violation of the civil rights of Reverend Doctor Lasko and of the Worldwide Ministries of Jesus Christ.

Respectfully submitted,



Reverend Doctor Keith Alan Lasko, M.D., Doctor of Divinity (Hon.)

8604 Vivid Violet Avenue

Las Vegas, Nevada 89143

PRO SE

Dated: August 26, 2014

CERTIFICATE

Reverend Doctor Keith A. Lasko, M.D., Doctor of Divinity (Hon.) hereby certifies that a copy of this document will be sent to the defendants' legal representatives of record no later than August 29, 2014 by certified regular mail, regular mail, or by priority mail. To the best of my knowledge the list of the defendants' legal representatives is as follows:

BALLARD SPAHR LLP
100 N CITY PKWY #1750
LAS VEGAS, NV 89106

LEWIS ROCA ROTHGERBER LLP
3993 HOWARD HUGHES PARKWAY
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LAS VEGAS, NEVADA 89169

GORDON AND REES LLP
3770 HOWARD HUGHES PARKWAY
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LAS VEGAS, NEVADA 89169

KOLESAR AND LEATHAM
400 SOUTH RAMPART BLVD.
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LAS VEGAS, NEVADA 89145

ROGER W. WENTHE, ESQ.
U.S. ATTORNEYS OFFICE CIVIL DIVISION
333 LAS VEGAS BOULEVARD, SOUTH #5000
LAS VEGAS, NV 89101

Signed:



Reverend Doctor Keith A Lasko, M.D., Doctor of Divinity (Hon.)

Pastor of the First Church of the Epiphany and the Worldwide Ministries of Jesus Christ

8604 Vivid Violet Avenue

Las Vegas, Nevada 89143

PRO SE

Dated: August 26, 2014